

SULLIVAN PAPAIN BLOCK McGRATH & CANNAVO P.C.

120 BROADWAY • NEW YORK • NEW YORK 10271

TELEPHONE: (212) 732-9000

FACSIMILE: (212) 266-4141

SPBMC-NY@TrialLaw1.com

www.TrialLaw1.com

MEMO ENDORS

Robert G. Sullivan
Nicholas Papain
Michael N. Block
Christopher T. McGrath
Vito A. Cannavo
John F. Nash
Frank V. Floriani
Marie Ng
Eleni Coffinas

David J. Dean
Hugh M. Turk
Albert B. Aquila
Brian J. Shoot
Andrew J. Carboy
Mary Anne Walling
Eric K. Schwarz
Elizabeth Montesano

PLEASE REPLY TO:

New York City Office

Matthew J. Jones
Deanne M. Caputo
Beth N. Jablon
Liza A. Milgrim
Susan M. Jaffe
Wendell Y. Tong
Terrence L. Tarver
Clifford S. Argintar
Thomas J. McManus
Michael W. Lever

Lauren M. Pennisi
Laura M. Schaefer
Joseph N. Armao
Alison D. Metzler
Sean A. McConnell
Glenn W. Nick
Gabriel Arce-Yee
Alexis Diaz
Meigan P. Serle
Jamie B. Weissglass

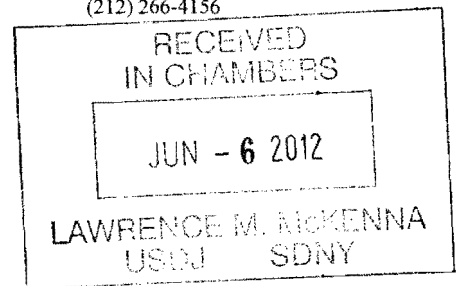
Hon. Joseph N. Giamboi (ret.)
Stephen C. Glasser
Paul F. Oliveri
Of Counsel

John M. Tomskey
Counsel to the Firm

*all parties & counsel will be
heard regarding the settlement
and fees after the petition
is filed. See or - June 5, 2012
decid.*

Chambers,
Hon. Lawrence M. McKenna
United States District Judge
United States Courthouse
500 Pearl Street, Room 1640
New York, NY 10007

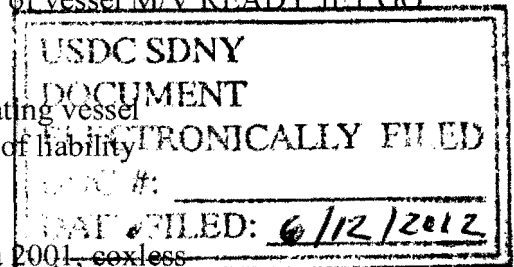
Author's e-mail address:
FFloriani@TrialLaw1.com
Direct Telephone Line:
(212) 266-4126
Private Fax Line:
(212) 266-4156



RE: In the Matter of the Complaint of ANDREW HARNETT, as owner of vessel M/V READY IET GO
U.S.D.C.S.D.N.Y.: 06-699 (LMM)

In the Matter of Peter J. Sharp Boathouse, Inc., as owner of the floating vessel
constituting the boat house, seeking exoneration from or limitation of liability
U.S.D.C.S.D.N.Y.: 06 Civ. 3061 (LMM)

In the Matter of New York Rowing Association, Inc., as owner of a 2001, coxless
Empacher rowing shell, seeking exoneration from or limitation of liability
U.S.D.C.S.D.N.Y.: 06 Civ. 3062 (LMM) and a related case.



Honorable Sir:

This firm represented Nina Runsdorf and Lee Runsdorf as co-Executors of the Estate of Jim H. Runsdorf, deceased, as claimants in the above matters. We were substituted as claimants' counsel by the law firm of Napoli Bern Ripka, LLP.

We have recently been advised that a settlement has been reached with all parties and that a compromise petition will be submitted to the Court for the purpose of approving the settlement.

My purpose in writing is to notify the Court that while we have no objection to an allocation for the purpose of a distribution to the decedent's estate and his distributees, that we respectfully request the opportunity to be heard regarding any allocation of the settlement for attorney's fees.

SUFFOLK OFFICE
33105 Main Road, Cutchogue, New York 11935
TELEPHONE: (631) 734-2500 • FACSIMILE: (631) 734-2502
SPBMC-LI@TrialLaw1.com

NASSAU OFFICE
1149 Franklin Avenue, Garden City, New York 11530
TELEPHONE: (516) 742-0707 • FACSIMILE: (516) 742-7350
SPBMC-LI@TrialLaw1.com

NEW JERSEY OFFICE
126 State Street, Hackensack, New Jersey 07601
TELEPHONE: (201) 342-0037 • FACSIMILE: (201) 342-6461
SPBMC-NJ@TrialLaw1.com

As the attorneys who initially filed the claims in the above matter, this firm has a lien for its attorney's fees pursuant to §475 of the Judiciary Law of the State of New York¹.

Accordingly, we would appreciate the opportunity to provide the Court with an accounting of the work done by this firm at the time it entertains the compromise petition.

Thank you.

Respectfully submitted,

SULLIVAN PAPAIN BLOCK
McGRATH & CANNAVO P.C.

By: 
FRANK V. FLORIANI (FF4488)

FVF:ds
(063618)

cc:
Marc Jay Bern, Esq.
Napoli Bern Ripka, LLP
Empire State Building
350 Fifth Avenue, Ste 7413
New York, NY 10118

Rubin, Fiorella & Friedman LLP
292 Madison Avenue
New York, NY 10017
Attn: James M. Mercante, Esq.

Wilson Elser Moskowitz Edelman & Dicker, LLP
150 East 42nd Street
New York, NY 10017-5639
Attn: Lawrence B. Brennan, Esq.

¹ "From the commencement of an action, special or other proceeding in any court or before any state, municipal or federal department, except a department of labor, or the service of an answer containing a counterclaim, the attorney who appears for a party has a lien upon his client's cause of action, claim or counterclaim, which attaches to a verdict, report, determination, decision, judgment or final order in his client's favor, and the proceeds thereof in whatever hands they may come; and the lien cannot be affected by any settlement between the parties before or after judgment, final order or determination. The court upon the petition of the client or attorney may determine and enforce the lien."

N.Y. Judiciary Law § 475 (McKinney)